



Colorado Department  
of Public Health  
and Environment

December 2, 2004

Mr. Joseph Legare  
Director, Project Manager Division  
U.S. Department of Energy  
Rocky Flats Project Office  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

Dear Mr. Legare

**RE: Draft-Final Comprehensive Risk Assessment (CRA) Sampling and Analysis Plan (SAP) Addendum 05-01, Phase 2 – Targeted Sampling, November 2004**

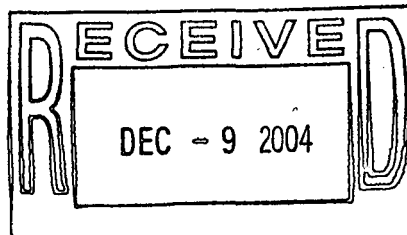
The Phase 2 CRA SAP Addendum appropriately designates the targeted surface water and sediment locations that were agreed to in recent Risk Assessment Working Group (RAWG) meetings. Sampling and analyses for the locations included in this SAP Addendum are approved.

However, please note that samples in addition to those approved in this document may be identified by evaluations that are not yet complete. For example, details from the Site's review of air modeling data may determine potential soil depositional areas for dioxins.

The second paragraph on page 1 (Section 2.0, Sampling) indicates that the technician will conduct stream sampling by targeting the sediment depositional areas, and sample the top 6-inches while standing on the edge of the stream bank. Depth of the stream sediment should be determined and samples should be collected at the top 0-6-inch interval plus additional 2-foot intervals based on the total depth of the sediment.

In addition, the statement that samples will be collected while standing on the edge of the stream should be clarified. Depending on where depositional sediment occurs, the collection of sediment in streams may involve stepping into the stream bed (downstream of the location to be sampled). Please revise the method to clearly indicate that sediment from the stream channel, and not soil from the bank of the stream, will be sampled.

The SAP indicates that samples will be analyzed for total dioxin. It is important to include mention that the samples will be archived for future dioxin congener analysis should an evaluation of the total dioxin data warrant additional analyses. Holding times for the archived samples should be clearly indicated so that decisions can be made on a timely basis.



ADMIN RECORD

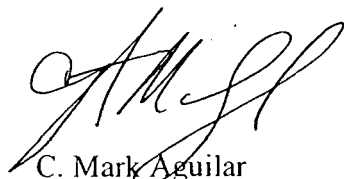
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The document describes field decisions regarding identification of sediment depositional areas and determination of total depth of sediment. EPA and the State would like to be given advance notification of sampling and attempt to be present during sampling, as schedules will allow.

Please contact one of us, or Risk Assessment Working Group staff, Robyn Blackburn (312-6663) or Tracy Hammon (692-2693), if you have any questions regarding these comments.

Sincerely,



C. Mark Aguilar  
Rocky Flats Team Leader



for  
Steven H. Gunderson  
Rocky Flats Project Coordinator

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